

JEL MANUFACTURING LLC,)	Case No.: _____
)	
)	
Plaintiff,)	
)	
v.)	Formerly Case No. 2020CV005478
)	Milwaukee County Circuit Court
)	
SELECTIVE INSURANCE COMPANY OF THE)	
SOUTHEAST,)	PETITION FOR REMOVAL
)	
Defendant.)	
)	

1. Selective Insurance Company of the Southeast has been named as a Defendant in this action, which was filed on September 16, 2020 in the Circuit Court of Milwaukee County, Wisconsin. The case is entitled *JEL Manufacturing LLC v. Selective Insurance Company of the Southeast*, and has been designated as Milwaukee County Case No. 2020CV005478.

Case 2:20-cv-01612-PP Filed 10/22/20 Page 1 of 3 Document 1

attached are exhibits A-F to the Summons and Complaint. The Summons and Complaint, along with Exhibits A-F, constitute all pleadings and Orders that have been served upon the Defendant.

3. Selective Insurance Company of the Southeast was served with the Summons and Complaint on September 24, 2020. Accordingly, this Petition for Removal is timely pursuant to 28 U.S.C. 1446(b)(2)(B) because it has been filed within thirty (30) days after Selective Insurance Company of the Southeast was served with the Summons and Complaint. The service of the Summons and Complaint was Selective Insurance Company of the Southeast's first notice regarding the filing of this action.

4. The subject action is a civil action of which this court has original jurisdiction pursuant to 28 U.S.C. § 1332(a), and is one which may be removed to this court by the Defendants pursuant to 28 U.S.C. § 1441. These provisions are met because this is a civil action between citizens of different states and the amount of controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

5. The Plaintiff, JEL Manufacturing LLC, is a Wisconsin Limited Liability Company with its principle place of business located at 3073 South Chase Avenue, Bldg. 35, Milwaukee, Wisconsin, 53207.

6. The Defendant, Selective Insurance Company of the Southeast, is an Indiana corporation with its principle place of business in New Jersey.

7. Written notice of the filing of this Petition for Removal has been served upon all parties.

8. A Notice stating that this matter has been removed to Federal Court has been filed with the Clerk of the Circuit Court of Milwaukee County, Wisconsin.

WHEREFORE, the Defendant, Selective Insurance Company of the Southeast, requests that the action currently pending in the State of Wisconsin, Circuit Court for Milwaukee County be removed to this Court and proceed in this Court.

Dated this 22nd day of October, 2020.

s/ Frederick J. Strampe
Frederick J. Strampe
State Bar No. 1029795
Attorneys for Defendant Selective Insurance Company of
the Southeast
BORGELT, POWELL, PETERSON & FRAUEN, S.C.
1243 N. 10th Street, Suite 300
Milwaukee, WI 53205
Phone: (414) 276-3600
Fax: (414) 276-0172
E-mail: fstrampe@borgelt.com